

Tina Andolina
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Hello, my name is Tina Andolina with the Coalition for Clean Air. Thank you for this opportunity to speak on this important issue.

- To begin, we want to commend staff and Board for removing the provision from the proposed amendments that would have allowed significant Executive Officer discretion in the future. We have two remaining, significant concerns:
- First and foremost, the proposed amendments do not address the increase in pollution which will result due to the proposed three year delay. ARB should hold agencies accountable for these emission reductions. While transit agencies which chose the alt fuel path have continued to step to the plate with significant investment in thousands of natural gas buses, the diesel path is not being held accountable to carry its own weight. While we recognize the benefits of the Advanced Demonstration Project, this project will not make up for the loss in emissions reductions during that three year timeframe. Similarly, while we support the extension of the purchasing requirement to 2026, this does not address the need to see reductions sooner.
- We recommend the Board require near-term reductions to make up for the loss in reductions caused by the proposed delay.
- Secondly, we do not support the proposed performance-based criteria. Without sending a clear message that transit agencies will be accountable for meeting the purchasing requirement, in 2009 and 2011 we will still be faced with the same issues we are dealing with today. Using performance-based criteria simply creates a perverse incentive for new technology to under perform. We can't go into this requirement with one foot out the door. We must be committed to ensuring this technology is developed. The performance-based criteria undermine that commitment and should be dropped completely.

Thank you for considering these comments.